

### **REMARKS**

By this amendment, Claims 24-37 and 40-48 have been cancelled. Claim 38 has been amended. Claims 49-63 have been added. Hence, Claims 38-39 and 49-63 are pending in the application.

### **SUMMARY OF THE REJECTIONS**

Prior Claims 24-37 and 40-48 stand rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent No. 6,671,063 to Iida ("*Iida*") and U.S. Patent No. 5,983,200 to Slotznick ("*Slotznick*"). Prior Claims 38-39 stand rejected under 35 U.S.C. 103(a) as being unpatentable over *Slotznick* and *Iida* as applied to Claim 24, and further in view of U.S. Patent No. 6,823,172 to Forrest ("*Forrest*").

The rejections are respectfully traversed.

### **DISCUSSION**

The examiner is thanked for the performance of a thorough search. Applicant appreciates the telephone interview conducted on June 7, 2006. During the interview, Applicant presented the Examiner with a proposed amendment to claim 38. After discussion, the Examiner stated that the amendment "definitely overcame" the *Forrest* reference. Applicant has amended claim 38 in accordance with the proposed amendment, and believes the amendments place the case in condition for allowance.

Applicant has added a new independent claim incorporating the agreed-upon amendment and several new dependent claims, all of which Applicant believes are in condition for allowance based upon the telephonic interview.

Hereinafter, Applicant will briefly address the issues raised in the Office Action for the sake of clarity and completeness of the record, and to satisfy any obligations under relevant sections of the MPEP to reply to an outstanding Office Action.

#### **I. ISSUES RELATING TO PRIOR ART**

##### **A. CLAIMS 24-37, 40-48**

Claims 24-37 and 40-48 stand rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent No. 6,671,063 to Iida ("*Iida*") and U.S. Patent No. 5,983,200 to Slotznick ("*Slotznick*"). The rejection is respectfully traversed.

To establish a prima facie case of obviousness under 35 U.S.C. § 103(a), three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the references or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the cited reference (or references when combined) must teach or suggest all the claim limitations. See MPEP § 2143, Basic Requirements of a Prima Facie Case of Obviousness.

The Office Action states that *Slotznick* fails to teach a web server configured to dynamically generate web page data that can be processed by a web browser for display on the wireless device, wherein the web page data is generated by the web server based on the received electronic document information, and a printer driver configured to process the electronic document information and generate print ready data based on at least the non-print ready data in the electronic document information.

The Office Action cites *Iida*, col. 6, lines 18-20, as anticipating the claimed feature, "a printer driver configured to process the electronic document information and generate print ready data based on at least the non-print ready data in the electronic document information."

The cited section of *Iida* reads:

A printer driver for using the network facsimile apparatus as a printer is installed in advance at client machine 202.

This is clearly not the case in the present application. The claims specifically require "A printing apparatus comprising... a printer driver..." The cited reference explicitly teaches away from the claimed feature, as the printer driver in Claim 1 is located on the printing interface apparatus; not a "client machine," and not a printer.

Interpreting the *Iida* reference to require a printer driver to be installed anywhere but the client machine renders *Iida* inoperable for its intended purpose, because *Iida* does

not teach, suggest or disclose capability for printing to the network facsimile where a printer driver is not present on the client machine.

The Examiner claims that it is "well known in the art" that a printer driver can be installed into a printer. As described above, the printer driver feature of claim 1 is installed on a printing interface apparatus, not a printer.

Despite this clear difference, Applicant further contends that the facts asserted by the Examiner are not "capable of instant and unquestionable demonstration" as required by MPEP 2144.03 and Applicant craves reference to a citation of some reference work recognized as standard in the pertinent art.

## **II. CONCLUSIONS & MISCELLANEOUS**

For the reasons set forth above, all of the pending claims are now in condition for allowance. The Examiner is respectfully requested to contact the undersigned by telephone relating to any issue that would advance examination of the present application. If any applicable fee is missing or insufficient, throughout the pendency of this application, the Commissioner is hereby authorized to any applicable fees and to credit any overpayments to our Deposit Account No. 50-1302.

Respectfully submitted,

HICKMAN PALERMO TRUONG & BECKER LLP



Edward A. Becker

Reg. No. 37,777

Date: July 19, 2006

2055 Gateway Place Suite 550  
San Jose, California 95110-1089  
(408) 414-1204  
Facsimile: (408) 414-1076

**CERTIFICATE OF MAILING**

I hereby certify that this correspondence is being deposited with the United States Postal Service as first class mail in an envelope addressed to: Hon. Commissioner for Patents, Mail Stop AMENDMENT, P.O. Box 1450, Alexandria, VA 22313-1450.

on July 19, 2006

by Tracy Reynolds  
Tracy Reynolds